

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ERIN F GOTWALS,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 20-cv-03455
	)	
MIDLAND CREDIT MANAGEMENT, INC.,	)	Hon. Martha M. Pacold
MIDLAND FUNDING, LLC, and ENCORE	)	
CAPITAL GROUP, INC.,	)	Magistrate Judge M. David Weisman
	)	
Defendants.	)	

**JOINT MOTION FOR EXTENSION OF TIME  
TO FILE STIPULATION OF DISMISSAL**

NOW COME Plaintiff and Defendants, by and through their respective undersigned attorneys, and jointly move the Court for an extension of time to file a stipulation of dismissal with prejudice. In support of this motion, the parties respectfully state as follows:

1. The parties are finalizing execution of the settlement agreement. Once the settlement agreement is executed, Defendant will issue payment and the case should be dismissed with prejudice.
2. The parties request an additional 30 days to file a stipulation of dismissal with the Court.
3. If the parties experience any other issues with documenting and finalizing the settlement, the parties will promptly notify the Court.

[signatures on following page]

Respectfully submitted,

s/ Daniel Brown

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**CERTIFICATE OF SERVICE**

I, Daniel Brown, an attorney, hereby certify that on February 10, 2021, I electronically filed the foregoing document using the CM/ECF system, which will send notification of such filing to all attorneys of record.

By: /s/ Daniel Brown  
Daniel Brown